

1 THE HONORABLE JOHN C. COUGHENOUR
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 RHETT E. TAYLOR and LAURIE D.
11 TAYLOR,

12 Plaintiffs,

13 v.

14 PNC BANK, NATIONAL
15 ASSOCIATION,

Defendant.

No. 2:19-cv-01142-JCC

DEFENDANT PNC BANK, NATIONAL
ASSOCIATION'S MOTION FOR RELIEF
FROM DEADLINE TO RESPOND TO
PLAINTIFFS' MOTION FOR SUMMARY
JUDGMENT

NOTE ON MOTION CALENDAR:

FRIDAY, APRIL 24, 2020

16 Defendant PNC Bank, National Association ("PNC"), by and through the undersigned
17 counsel, respectfully requests to modify the date by which PNC's opposition to Plaintiffs'
18 Motion for Summary judgment is due.

19 On Friday, April 2, 2020, Plaintiffs filed their Motion for Summary Judgment with a
20 hearing date set for Friday, April 24, 2020. Defendant PNC's opposition to Plaintiffs' Motion for
21 Summary Judgment is currently due on Monday, April 20, 2020.

22 Attorneys for PNC and representatives for PNC are currently out of the office working
23 from home given the current COVID-19 pandemic. PNC respectfully requests two-weeks
24 additional time to respond to Plaintiff's Motion for Summary Judgment to allow additional time

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26 DEFENDANT PNC BANK, NATIONAL ASSOCIATION'S
MOTION FOR RELIEF FROM DEADLINE TO RESPOND TO
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT
(No. 2:19-cv-01142-JCC) -1

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1 for PNC to review and prepare the opposition and supporting documents, including having the
2 Declaration of PNC compiled, reviewed and signed.

3 Specifically, PNC requests two-weeks additional time to respond to Plaintiffs' Motion for
4 Summary until Monday, May 4, 2020 to oppose Plaintiffs' Motion for Summary Judgment
5 setting the hearing date at Friday, May 8, 2020.

6 This Motion is made in good faith and not for the purposes of delay. If granted, this
7 Motion will not result in prejudice to any of the parties. Further, this Motion will not affect any
8 of the other dates set by the Court in its November 27, 2019 Order.

9 DATED: April 16, 2020

10 By: s/ Thomas N. Abbott
11 Kristine E. Kruger, WSBA #44612
12 Thomas N. Abbott WSBA #53024
13 Attorneys for Defendant
14 PNC BANK, NATIONAL ASSOCIATION
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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2020, I electronically filed the foregoing DEFENDANT PNC BANK, NATIONAL ASSOCIATION'S MOTION FOR RELIEF FROM DEADLINE TO RESPOND TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Christina L Henry, WSBA 31273
Jacob D. DeGraaff, WSBA# 36713
HENRY & DEGRAAFF, PS
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And I hereby do certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

Non ECF ServiceList

s/ Matthew Walkup
Matthew Walkup